



# **DISTRICT OF COLUMBIA WATER AND SEWER AUTHORITY**

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August 30, 2004

Ms. Karen Johnson, Chief  
Safe Drinking Water Act Branch  
United States Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, Penn. 19103-2029

Re: Plan for Selecting 1000 Priority Sites  
USEPA –DCWASA Administrative Order  
Consent Docket No. SDWA-03-2004-0259DS

Dear Ms. Johnson:

This is in reply to your letter dated August 10, 2004 in which you listed EPA's concerns and the associated clarifications needed in order to approve WASA's plan for selecting priority sites. The numbering of this response corresponds to the numbering of the issues in your letter.

1. During calendar 2004 WASA elected to replace 500 lead services based on priorities jointly established by DCDOH, EPA and WASA. Attached is the documentation you requested which consists of letters and e-mails. Telephone conversations also occurred but are not documented except as may be referenced in the attached e-mails. In summary, the primary contacts with DCDOH were with Drs. Lucey, Faggett, Calhoun and Thomas. This documentation indicates DCDOH concurrence with the criteria for the 2004 Calendar Year. The agreement occurred during the May 2004 time frame

WASA is proposing to use the same criteria used in calendar year 2004 but with a different priority ranking for replacement years 2005 and 2006. The change in ranking that is being proposed is to replace daycare centers as the first priority with homes with children with elevated blood lead levels as the first priority. Daycare centers would become the second priority and the third priority will remain as customers classified as having "high risk status ranked by 2<sup>nd</sup> draw water lead test results and at risk status and have lead service lines. WASA is presently seeking concurrence with DCDOH for this change thru the attached letter recently sent to DCDOH.

2. To address the confusion generated by the use of different year terminologies use in the original submittal the revised plan has been amended to conform to the following:

- a) 2004 Replacement Year: October 1, 2003 through September 30, 2004
- b) 2005 Replacement Year: October 1, 2004 through September 30, 2005
- c) 2006 Replacement Year: October 1, 2005 through September 30, 2006

Please note that these replacement year designations correspond with federal and WASA fiscal years and with dates required for replacement under the LCR replacement program and the Administrative Order.

Your reference to section A.5. in the original proposed plan is not clear. Perhaps the confusion relates to the WASA reference to its 2004 Calendar Year Program. Please note that:

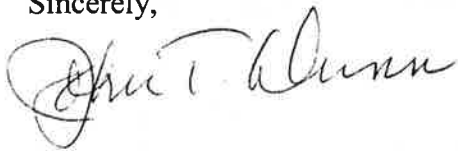
- a) This program was not mandated by EPA.
- b) WASA, in coordination with DC DOH and EPA, elected to formulate a priority program for calendar year 2004 that is comprised of 500 lead service replacements following the criteria previously noted that was jointly agreed to by DOH, EPA and WASA.
- c) The contractual date for completion of the 500 LSRs in this program is December 31, 2004. However, many of these LSRs will be complete by the end of the 2004 Year Replacement Program and hence will be counted toward the LCR requirement of 1615 LSRs. The current estimate for priority replacements that will be complete by September 30, 2004 is over 220, however a better estimate will be supplied to EPA when WASA reports on its 2004 Replacement Year Program prior to September 30, 2004.

3. WASA's policy is to comply with all applicable rules, regulation and legislation and will do so under the proposed plan.
4. A list supplied by DOH contained six hundred and ninety eight (698) daycare centers. In order to select daycare centers with known or suspected lead service lines, knowledgeable staff searched the Customer Information Service (CIS) database as well as using other sources available such as as-built plans submitted by contractors. Based on data base information such as indicated material of construction, line size and date installed, a judgment was made as to whether the line is lead or is suspected to be lead. The results of this evaluation are as follows:
  - a) 228 daycare centers were identified.
  - b) The final list included daycare centers listed in the CIS that were listed as having "unknown" material of construction.

5. WASA received 2707 Priority Replacement Application forms by the cut-off date of April 30, 2004. The addresses of applicants were cross-referenced with our CIS system to identify those with lead service lines. Although 2707 customers submitted forms, not all these forms indicated that the customers were qualified by virtue of an "at-risk status" (children under 6, pregnant/nursing mothers). For example, some customers self-identified their status as having children over 6 years or cited other health considerations. WASA eliminated the customers who did not meet the definition of "at risk" as defined in the calendar 2004 criteria. The 1500 customer noted were those who self-identified as at risk and also were indicated in our CIS system as having lead services.
6. WASA intends to periodically update its lists of "at-risk" addresses based on:
  - a) Refinements of its CIS system by identifying unknowns addresses or otherwise identifying lead services.
  - b) Adding additional at risk customers who complete the requisite forms.
7. As noted in Item I above, WASA intends to treat the homes of children under the age of six (6) with high blood lead level as the highest priority for the 2005 and 2006 Replacement Year programs. WASA's medical consultant stressed that children with elevated blood lead levels should be regarded as the top priority, however, if DCDOH disagrees with this assessment WASA will act in accordance with their decision. WASA should have clarified this point in the original submission and is included in the attached revised plan.
8. The revised plan includes a section on reporting priority replacements as part of the annual report to EPA.

I hope that this letter and the revised plan completely addresses your concerns so that WASA can move forward on implementation.

Sincerely,



John T. Dunn, PE  
Interim Chief Engineer/Deputy General Manager

**Revised August 30, 2004**  
**USEPA- DCWASA ADMINISTRATIVE ORDER**  
**Consent Docket No. SDWA-03-2004-0259DS**  
**Paragraphs 81 and 82; Submittal Requirements**

Pursuant to Paragraphs 81 and 82 of the above noted EPA Administrative Order, DCWASA hereby submits its prioritization plan for selecting 1000 lead services for replacement in the time period October 1, 2004 through September 30, 2006.

**1. Background:**

In formulating the 2004 Calendar Year priority program, WASA consulted extensively with the DC Department of Health and EPA regarding criteria for prioritizing lead service replacements. Documentation of this coordination has been submitted to USEPA. As a result, DC DOH, EPA and WASA adopted the following plan:

- A. Approximately 100\* home day care centers with lead service lines;
- B. Approximately 100\* homes with lead service lines or service line that are listed as being of unknown material that have children under six years of age with elevated blood lead levels;
- C. Approximately 300\* homes with high lead water levels that are occupied by members of the target population.

(Note: \* Indicates these were initial estimates)

Later discussions and correspondence with DC DOH defined the target population in Item C above as pregnant or nursing mothers and children under six (6) years of age.

As note above WASA is replacing a minimum of 500 lead services during calendar year 2004. After extensive coordination, this priority program was implemented as follows:

- A. WASA obtained a list of daycare centers from DCDOH and identified centers with lead and possible lead services. In total 228 daycare centers were to be evaluated by test pitting to determine the material of the service. All lead services serving the identified daycare centers will be replaced prior to December 31, 2004.
- B. WASA obtained a list of addresses identified by DCDOH as having high blood lead levels in children and matched that against our database of lead services and 217 addresses were identified for lead service replacement

during calendar 2004. All lead services serving residences with children with high blood lead levels will be replaced prior to December 31, 2004.

- C. WASA made significant efforts to identify the "at risk" customers: ie, pregnant/nursing women and children under 6 years of age. In transmitting lead content water sample test results, customers were supplied with a *Request for Priority Replacement of Lead Water Service Line in Public Space* form a copy of which is attached.

This form was also mailed to all customers that WASA's CIS system indicated had a lead service, or where the service material was unknown. Furthermore, the form was available on WASA's website and could be filled out by our customer representatives who called our "Lead Hotline".

To meet its 2004 schedules, WASA set a deadline of April 30, 2004 for receipt of the priority replacement forms. WASA received 2707 forms by this date and entered all forms into a database (LMS System).

WASA then searched the database for all customers who identified themselves as "at risk" and whom also had lead service lines as indicated by our CIS system. However, many of the customers that did submit the forms did not meet the "at risk" criteria and were dropped from the list, which resulted in a total of 1500 addresses on the final list. WASA then ranked the results by 2<sup>nd</sup> draw lead test result.

## **2. Proposed Plan:**

The following definitions are used in this plan:

2005 Replacement Year- October 1, 2004 through September 30, 2005  
2006 Replacement Year- October 1, 2005 through September 30, 2006  
2004 Calendar Year- January 1, 2004 through December 31, 2004

WASA intends to perform 1000 priority lead service replacements during the 2005 and 2006 replacement years with the goal of doing 500 the first year.

### **A. Criteria for 2005 Replacement Year Program Selection:**

Five hundred replacements will be selected by the criteria agreed to by DCDOH, EPA and WASA for the 2004 calendar year priority program except with the interchange of priority 1 and priority 2 ranking that are presently under consideration by the DCDOH. In any event, WASA will utilize the ranking approved by DCDOH.

- a. The first priority will be all customers who have children under 6 years with elevated blood lead levels (10 ug/dl or greater) that have lead services that have not already been replaced under the 2004 program. To this end, WASA has requested a listing from DCDOH of blood lead test data obtained by them since January 1, 2004. WASA will continue to protect the privacy of all residents with high blood levels.

WASA will also search its database of the priority replacement (LMS System) for information for all customers who have identified themselves as at risk by virtue of high blood lead test results.

- b. The second priority will be any day care centers that have begun operation since last year's evaluation and that may have lead service lines.
- c. The third priority group will be those "at risk". WASA will utilize an up-dated "at risk" list that was developed in 2004 and ranked by the highest 2<sup>nd</sup> draw lead water test results. WASA estimates that approximately 500 addresses over the action level of 15 ppb will remain after removing addresses replaced during the 2004 priority program and those addresses removed from the list by virtue of replacement during the 2004 or 2005 block-by-block replacement program.

A. Criteria for 2006 Replacement Year Program Selection:

Five hundred (500) replacements will be selected by the criteria used in 2005.

3. Reporting:

In conjunction with the required annual reporting regarding with respect to the 7% replacement requirement of the LCR, WASA will report on its priority program by September 30 of each year. WASA will report the number of replacements done under the priority replacement criteria. WASA will also report:

- A. The total number of addresses that meet one of the priority categories for the Replacement Year program.
- B. The addresses of LSRs done under this portion of the Replacement Year Program.